## UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA DURHAM DIVISION

In Re:

**Allen Jones And Kathryn Jones** 

Case No. 07-81356 Chapter 13

Social Security No. xxx-xx-7835 and xxx-xx-6150 Address:2518 West Wilson St., Durham, 27705-

**Debtors** 

## RESPONSE TO TRUSTEE'S MOTION TO MODIFY

**NOW COME** the Debtors above-named, through counsel, and respectfully request that the Chapter 13 Trustee's Motion to Modify be set for hearing.

Dated: February 23, 2011

LAW OFFICES OF JOHN T. ORCUTT, P.C.

/s Edward Boltz Edward Boltz N.C. State Bar No. 23003 1738-D Hillandale Rd., Durham, N.C. 27705 (919) 847-9750

claimond.wpt (rev. November 30, 2010)

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## **CERTIFICATE OF SERVICE**

I, Renee Nolte, certify under penalty of perjury that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age and that on February 23, 2011. I served copies of the foregoing **RESPONSE TO MOTION TO MODIFY** electronically or, when unable, by regular first-class U.S. mail, addressed to the following parties:

Richard M. Hutson, II Chapter 13 Trustee

/s Renee Nolte